

Jared Walker (SB#269029)
P.O. Box 1777
Orangevale, CA 95662
T: (916) 476-5044
F: (916) 476-5064
jared@jwalker.law

Attorney for Plaintiff,
NELSON QUONG

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NELSON QUONG,

Plaintiff,

V.

KILOLO KIJAKAZI,

Acting Commissioner of Social Security,

Defendant.

Case No.: 2:21-cv-02134-JDP

**STIPULATION FOR FIRST EXTENSION
OF TIME FOR PLAINTIFF TO FILE
OPENING BRIEF**

IT IS STIPULATED, by and between the parties, through their respective counsel of record, that the time for Plaintiff to file his motion for summary judgment be extended 60 days, *nunc pro tunc*, from the original deadline, such that Plaintiff's new deadline, with the Court's approval, will be October 14, 2022. This is Plaintiff's first request for an extension of time and is sought belatedly after his counsel failed to timely note defendant's lodging of the administrative record in this case; and upon realizing that error, needing additional time to review the lengthy record in this case which consists of more than 5,000 pages of evidence. Preparation of Plaintiff's motion has been further delayed due to his counsel's need to attend to other conflicting deadlines in unrelated matters he is solely responsible for; particularly, competing motion filing deadlines in seven other social security disability cases pending in district or circuit court, and responsibility for conducting time sensitive due diligence and pre-closing permitting work in a purchase transaction of commercial real estate located in San Jose, CA. With the Court's approval, the parties further stipulate that all other dates in the Court's Scheduling Order be extended accordingly alongside Plaintiff's extension.

1 Dated: September 15, 2022

Respectfully submitted,

3 /s/ Jared T. Walker

4 Jared T. Walker,
Attorney for Plaintiff

7 SO STIPULATED:

8
9 PHILLIP A. TALBERT
United States Attorney

11 Dated: September 15, 2022

12 By: /s/ *Caspar Chan

(*authorized by email on 9/15/2022)

13 CASPAR CHAN
Special Assistant United States Attorney
14 Attorneys for Defendant

15 ORDER

17 IT IS SO ORDERED.

18 Dated: September 23, 2022

19
20 
JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE